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**Attorney for Defendant
Michael Thomas Ragnone**

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL THOMAS RAGNONE ,

Defendant.

Case No: 11-cr-323-01-MO

**OPPOSED EMERGENCY MOTION FOR
TEMPORARY RELEASE**

(ORAL ARGUMENT REQUESTED)

Defendant, Michael Ragnone, by and through his attorney, Gary B. Bertoni, moves for temporary release from custody so he may attend his mother's funeral services on April 10, 2013, at 10:00 am, to be followed by her internment at Mt. Calvary Catholic Cemetery. This motion is based on the reasons as set forth in the Declaration of Counsel Oregon. Assistant United States Attorney Leah Bolstad was contacted and opposes this motion.

DATED this 25th day of March 2013.

s/ Gary B. Bertoni

GARY B. BERTONI, OSB #781414

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2013, I electronically filed the foregoing with the Clerk of the Court using CM/ECT system, which will send notification of such filing to the attorney (s) of record for the defendant.

/s/**Ryan A. Kovac**

LA to Gary B. Bertoni